UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In Re:	AUTOMOTIVE PARTS
ANTI	TRUST LITIGATION

Master File No. 12-md-02311 Honorable Marianne O. Battani

In Re: All Auto Parts Cases

THIS DOCUMENT RELATES TO:

All Auto Parts Cases

2:12-md-02311-MOB-MKM

NOTICE OF CERTAIN DEFENDANTS' OBJECTIONS TO END PAYOR PLAINTIFF AND AUTO DEALER PLAINTIFF DEPOSITION PROTOCOL ORDER

Certain Defendants¹ hereby give notice that they object to Paragraphs III.B, III.D.1,

III.D.3, III.D.7, and IV.B of the End Payor Plaintiff and Auto Dealer Plaintiff Deposition

Protocol Order (MDL ECF No. 1021), for the reasons stated in Certain Defendants' Objections

__

¹ Bridgestone Corporation, Bridgestone APM Company, Calsonic Kansei Corporation, Calsonic Kansei North America, Inc., DENSO Corp., DENSO International America, Inc., ASMO Co., Ltd., ASMO North America, LLC, ASMO Manufacturing, Inc., ASMO Greenville of North Carolina Inc., SKF USA Inc., NSK Ltd., NSK Americas, Inc., JTEKT Corporation, JTEKT Automotive North America, Inc., Nachi-Fujikoshi Corp., Nachi America, Inc., Toyo Tire & Rubber Co., Ltd., Toyo Automotive Parts (USA), Inc., Toyo Tire North America OE Sales LLC, Toyo Tire North America Manufacturing Inc., NTN Corporation, NTN USA Corporation, Mitsuba Corporation, American Mitsuba Corporation, Yamashita Rubber Co., Ltd., YUSA Corporation, Keihin North America, Inc., Alps Electric Co., Ltd., Alps Electric (North America), Inc., Alps Automotive, Inc., Schaeffler Group USA, Incorporated, Continental Automotive Systems, Inc., Continental Automotive Electronics LLC., Sumitomo Riko Co., Ltd., DTR Industries, Inc., Showa Corporation, American Showa, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric Automotive America, Inc, Robert Bosch LLC, Robert Bosch GmbH, Bosch Electrical Drives Co., Ltd., Stanley Electric Co., Ltd., Stanley Electric U.S. Co., Inc., II Stanley Co., Inc., Diamond Electric Mfg. Co., Ltd., Diamond Electric Mfg. Corp., Toyoda Gosei Co., Ltd., Toyoda Gosei North America Corp., TG Missouri Corp., Takata Corporation, TK Holdings Inc., Valeo S.A., Valeo Japan Co., Ltd., Valeo Inc., Valeo Electrical Systems, Inc., Valeo Climate Control Corp., Aisan Industry Co., Ltd., Aisan Corporation of America, Franklin Precision Industry, Inc., Koito Manufacturing Co., Ltd., North American Lighting, Inc., Sumitomo Electric Industries, Ltd., Sumitomo Wiring Systems, Ltd., Sumitomo Electric Wiring Systems, Inc., K&S Wiring Systems, Inc., and Sumitomo Wiring Systems (U.S.A.) Inc.

to, and Motion to Modify, Master Esshaki's June 18, 2015 Order ("June 18 Order"), filed on the master docket on June 19, 2015 (MDL ECF No. 1009) ("Motion to Modify") and the corresponding Reply brief (MDL ECF No. 1026), filed on the master docket on July 6, 2015. A hearing has been set for September 9, 2015 to resolve Certain Defendants' motion. *See* Scheduling Order on Objection to And Motions to Modify Master Esshaki's June [18], 2015 Order (MDL ECF. No. 1022).

Date: July 21, 2015

Respectfully submitted,

Steven A. Reiss

Adam C. Hemlock

Kajetan Rozga

WEIL, GOTSHAL & MANGES LLP

By: 5th Alm Ru

767 Fifth Avenue

New York, New York 10153-0119

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

steven.reiss@weil.com

adam.hemlock@weil.com

kajetan.rozga@weil.com

Frederick R. Juckniess

SCHIFF HARDIN LLP

350 South Main Street, Suite 210

Ann Arbor, MI 48104

(734) 222-1504

fjuckniess@schiffhardin.com

Attorneys for Bridgestone Corporation and

Bridgestone APM Company

Steven A. Reiss

Adam C. Hemlock

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue New York, New York 10153-0119 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 steven.reiss@weil.com adam.hemlock@weil.com

Fred K. Herrmann Joanne G. Swanson Matthew L. Powell KERR RUSSELL & WEBER PLC 500 Woodward Avenue Suite 2500

Detroit, MI 48226 Tel. (313) 961-0200 Fax (313) 961-0388 fherrmann@kerr-russell.com jswanson@kerr-russell.com mpowell@kerr-russell.com

Attorneys for Calsonic Kansei Corporation and CalsonicKansei North America, Inc.

By: /s/ Steven F. Cherry (w/consent)

Steven F. Cherry
David P. Donovan
Patrick J. Carome
Brian C. Smith
Kurt G. Kastorf

WILMER CUTLER PICKERING HALE AND DORR LLP

DOKK LLP

1875 Pennsylvania Avenue, NW

Washington, D.C.

Telephone: (202) 663-6000 Facsimile: (202) 663-6363 steven.cherry@wilmerhale.com david.donovan@wilmerhale.com patrick.carome@wilmerhale.com brian.smith@wilmerhale.com kurt.kastorf@wilmerhale.com Counsel for Defendants DENSO Corp., DENSO International America, Inc., ASMO Co., Ltd., ASMO North America, LLC, ASMO Manufacturing, Inc., ASMO Greenville of North Carolina Inc.

By: /s/ Debra H. Dermody (w/ consent)

Debra H. Dermody Michelle A. Mantine REED SMITH LLP 225 Fifth Avenue Pittsburgh, PA 15222

Telephone: (412) 288-3302/4268

Fax: (412) 288-3063

Email: ddermody@reedsmith.com

mmantine@reedsmith.com

/s/ Howard B. Iwrey (w/ consent)

Howard B. Iwrey (P39635)
Brian M. Moore (P58584)
DYKEMA GOSSETT PLLC
39577 Woodward Avenue
Bloomfield Hills, Michigan 48304
Telephone: (248) 203-0526

Fax:(248) 203-0763

Email: hiwrey@dykema.com bmoore@dykema.com

Attorneys for Defendant SKF USA Inc. in actions 2:13-cv-00502, -00503, -00505, and -13356-MOB-MKM)

By: /s/ Jeremy J. Calsyn (with consent)

Jeremy J. Calsyn (DC Bar #467737)
Teale Toweill (DC Bar #996061)
CLEARY GOTTLIEB STEEN & HAMILTON
LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 974-1500 (Phone)
(202) 974-1999 (Facsimile)
jcalsyn@cgsh.com
ttoweill@cgsh.com

David A. Ettinger (P26537)
HONIGMAN, MILLER, SCHWARTZ AND
COHN LLP
660 Woodward Avenue Suite 2209
Detroit, MI 48226-3506
(313) 465-7368 (Telephone)
(313) 465-7369 (Facsimile)
dettinger@honigman.com

Attorneys for Defendants NSK Ltd. and NSK Americas, Inc.

By: /s/ Heather L. Kafele (with consent)
Heather L. Kafele
Keith R. Palfin
SHEARMAN & STERLING LLP
801 Pennsylvania Ave., NW, Suite 900
Washington, DC 20004
Tel.: (202) 508-8097
Fax: (202) 508-8100
heather.kafele@shearman.com

Brian M. Akkashian PAESANO AKKASHIAN, PC 132 N. Old Woodward Avenue Birmingham, MI 48009 Tel.: (248) 792-6886 bakkashian@paesanoakkashian.com

keith.palfin@shearman.com

Counsel for JTEKT Corporation and JTEKT Automotive North America, Inc.

By: /s/ Kenneth R. Davis II (w/ consent)
Kenneth R. Davis II
Craig D. Bachman
Darin M. Sands
Masayuki Yamaguchi
LANE POWELL PC
MODA Tower
601 SW Second Ave., Suite 2100
Portland, OR 97204-3158
(503) 778-2100
(503) 778-2200 (facsimile)

davisk@lanepowell.com bachmanc@lanepowell.com sandsd@lanepowell.com yamaguchi@lanepowell.com

Larry S. Gangnes U.S. Bank Centre 1420 Fifth Ave., Ste. 4100 Seattle, WA 98101-2338 (206) 223-7000 (206) 223-7107 (facsimile) gangnesl@lanepowell.com

Richard D. Bisio (P30246) Ronald S. Nixon (P57117) KEMP KLEIN LAW FIRM 201 W. Big Beaver, Suite 600 Troy, MI 48084 (248) 528-1111 (248) 528-5129 (facsimile) richard.bisio@kkue.com ron.nixon@kkue.com

Attorneys for Defendants Nachi-Fujikoshi Corp. and Nachi America, Inc.

By: /s/ David C. Giardina (w/ consent)
David C. Giardina
Courtney A. Hoffmann
SIDLEY AUSTIN LLP
One S. Dearborn St.
Chicago, IL 60603

Tel.: (312) 853-7000 Fax: (312) 853-7036 dgiardina@sidley.com choffmann@sidley.com

Bradley J. Schram HERTZ SCHRAM PC 1760 S. Telegraph Rd., Suite 300 Bloomfiled Hills, MI 48302

Tel.: (248) 335-5000 Fax: (248) 335-3346

bschram@hertzschram.com

Counsel for Defendants Toyo Tire & Rubber Co., Ltd., Toyo Automotive Parts (USA), Inc., Toyo Tire North America OE Sales LLC, and Toyo Tire North America Manufacturing Inc.

By: /s/ Jeffrey L. Kessler (w/ consent)

Jeffrey L. Kessler
A. Paul Victor
Jeffrey J. Amato
Molly M. Donovan
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
jkessler@winston.com
pvictor@winston.com
jamato@winston.com
mmdonovan@winston.com

Fred K. Herrmann KERR, RUSSELL & WEBER PLC 500 Woodward Avenue, Suite 2500 Detroit, MI 48226 Tel. (313) 961-0200 fherrmann@kerr-russell.com

Attorneys for Defendants NTN Corporation and NTN USA Corporation

By: /s/ George A. Nicoud (w/ consent)
George A. Nicoud III
Austin Schwing
Stuart C. McPhail
Leslie A. Wulff
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street
San Francisco, CA 94105-0921

Tel.: (415) 393-8200 Fax: (415) 393-8306 TNicoud@gibsondunn.com ASchwing@gibsondunn.com SMcphail@gibsondunn.com LWulff@gibsondunn.com

Counsel for Defendants Mitsuba Corporation and American Mitsuba Corporation

By: /s/ James L. Cooper (w/ consent)
James L. Cooper
Danielle Garten
Adam Pergament
ARNOLD & PORTER LLP
555 Twelfth Street NW
Washington, DC 20004
(202) 942-5000
(202) 942-5999 (facsimile)
james.cooper@aporter.com
danielle.garten@aporter.com
adam.pergament@aporter.com

Fred K. Herrmann
Joanne Geha Swanson
KERR, RUSSELL AND WEBER, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
(313) 961-0200
(313) 961-0388 (facsimile)
jswanson@kerr-russell.com
fherrmann@kerr-russell.com

Attorneys for Defendants Yamashita Rubber Co., Ltd., and YUSA Corporation

By: /s/ Anita F. Stork (w/ consent)
Anita F. Stork
COVINGTON & BURLING LLP
One Front Street
35th Floor
San Francisco, CA 94111
Telephone: (415) 591-6000

Fax: (415) 955-6550

astork@cov.com

Bruce A. Baird
Sarah L. Wilson
Michael A. Fanelli
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street NW
Washington, DC 20001
Telephone: (202) 662-6000
Fax: (202) 662-6291
bbaird@cov.com
swilson@cov.com

/s/ Maureen T. Taylor

mfanelli@cov.com

Maureen T. Taylor BROOKS WILKINS SHARKEY & TURCO PLLC 401 Old South Woodward, Suite 400 Birmingham, MI 48009 Telephone: (248) 971-1721 Fax: (248) 971-1801

taylor@bwst-law.com

Attorneys for Defendant Keihin North America, Inc.

By: /s/ Anita F. Stork (w/ consent)

Anita F. Stork
Gretchen Hoff Varner
Cortlin H. Lannin
COVINGTON & BURLING LLP
One Front Street, 35th Floor
San Francisco, CA 94111
Telephone: (415) 591-6000
Fax: (415) 955-6550
astork@cov.com

/s/ Maureen T. Taylor (w/ consent)

Herbert C. Donovan (P51939) Maureen T. Taylor (P63547) BROOKS WILKINS SHARKEY & TURCO PLLC 401 Old South Woodward, Suite 400 Birmingham, MI 48009 Telephone: (248) 971-1721 Fax: (248) 971-1801 taylor@bwst-law.com donovan@bwst-law.com

Attorneys for Defendants Alps Electric Co., Ltd.; Alps Electric (North America), Inc.; and Alps Automotive, Inc.

By: /s/ Eric J. Mahr (w/ consent)

Eric J. Mahr Stacy E. Frazier 1875 Pennsylvania Ave., NW Washington, DC 20006 202-663-6446 eric.mahr@wilmerhale.com stacy.frazier@wilmerhale.com

Attorneys for Defendant Schaeffler Group USA, Incorporated
By: /s/ Ronald M. McMillan (w/ consent)
Ronald M. McMillan (OH 0072437)
John J. Eklund (OH 0010895)

Maura L. Hughes (OH 0061929) Alexander B. Reich (OH 0084869) CALFEE, HALTER & GRISWOLD LLP

The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114-1607
(216) 622-8200 (Phone)
(216) 241-0816 (Fax)
jeklund@calfee.com
mhughes@calfee.com
rmcmillan@calfee.com
areich@calfee.com

Maureen T. Taylor Herbert C. Donovan BROOKS, WILKINS, SHARKEY & TURCO PLLC 401 South Old Woodward, Suite 400 Birmingham, MI 48009 (248) 971-1800 (Phone) (248) 971-1801 (Fax) taylor@bwst-law.com donovan@bwst-law.com

Attorneys for Defendants Continental Automotive Systems, Inc. and Continental Automotive Electronics LLC

By: /s/ J. Clayton Everett, Jr. (with consent)
J. Clayton Everett, Jr.
Zarema A. Jaramillo
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Tel.: (202) 739-3000 Fax: (202) 739-3001 jeverett@morganlewis.com

zarema.jaramillo@morganlewis.com

Counsel for Defendants Sumitomo Riko Company Limited and DTR Industries, Inc.

By: /s/ J. Clayton Everett, Jr. (with consent)
J. Clayton Everett, Jr.
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004

Tel: 202-739-3000 Fax: 202-739-3001

jeverett@morganlewis.com

Matthew L. Fornshell ICE MILLER LLP 250 West Street Suite 700 Columbus, OH 43215

Tel: 614-462-1061 Fax: 614-222-3692

Matthew.Fornshell@icemiller.com

Counsel for Defendants Showa Corporation and American Showa, Inc.

By: <u>/s/ Terrence J. Truax</u> (w/ consent) Terrence J. Truax Charles B. Sklarsky
Michael T. Brody
Gabriel A. Fuentes
Daniel T. Fenske
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
ttruax@jenner.com
csklarsky@jenner.com
mbrody@jenner.com
gfuentes@jenner.com
dfenske@jenner.com

Gary K. August Jamie J. Janisch ZAUSMER, AUGUST & CALDWELL, P.C. 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334-2374 gaugust@zacfirm.com jjanisch@zacfirm.com

Counsel for Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc.

By: /s/ Michael S. Feldberg (with consent)
Michael S. Feldberg
John Roberti
Matthew Boucher
ALLEN & OVERY LLP
1221 Avenue of the Americas
New York, NY 10128
212-610-6300

1101 New York Avenue NW Washington, D.C. 20005 202-683-3800 michael.feldberg@allenovery.com john.roberti@allenovery.com matthew.boucher@allenovery.com

William R. Jansen (P36688) Michael G. Brady (P57331) WARNER NORCROSS & JUDD LLP 2000 Town Center, Suite 2700 Southfield, MI 48075-1318 248-784-5000 wjansen@wnj.com mbrady@wnj.com

Counsel for Robert Bosch LLC, Robert Bosch GmbH and Bosch Electrical Drives Co., Ltd.

By: /s/ Matthew J. Reilly (w/consent)
Matthew J. Reilly
Abram J. Ellis
David T. Shogren
SIMPSON THACHER & BARTLETT LLP
1155 F Street, N.W.
Washington, D.C. 20004

Tel.: (202) 636-5500 Fax: (202) 636-5502 matt.reilly@stblaw.com aellis@stblaw.com dshogren@stblaw.com

George S. Wang Shannon K. McGovern SIMPSON THACHER & BARTLETT LLP 425 Lexington Avenue New York, N.Y. 10017 Tel: (212) 455-2000 Fax: (212) 455-2502 gwang@stblaw.com smcgovern@stblaw.com

Attorneys for Defendants Stanley Electric Co., Ltd., Stanley Electric U.S. Co., Inc., and II Stanley Co., Inc.

By: /s/ Matthew J. Reilly (w/consent)
Matthew J. Reilly
Abram J. Ellis
SIMPSON THACHER & BARTLETT LLP
1155 F Street, N.W.
Washington, D.C. 20004
Tel.: (202) 636-5500

Fax: (202) 636-5500 Fax: (202) 636-5502 matt.reilly@stblaw.com aellis@stblaw.com George S. Wang Shannon K. McGovern SIMPSON THACHER & BARTLETT LLP 425 Lexington Avenue New York, N.Y. 10017 Tel: (212) 455-2000

Fax: (212) 455-2502 gwang@stblaw.com smcgovern@stblaw.com

Attorneys for Defendants Diamond Electric Mfg. Co., Ltd. and Diamond Electric Mfg. Corp.

By: /s/ Randall J. Turk (w/ consent)

Randall J. Turk John Taladay Mark Miller Heather Souder Choi Baker Botts L.L.P. 1299 Pennsylvania Avenue., NW Washington, D.C. 20004-2400

Phone: 202.639.7700 Fax: 202.639.7890

Counsel for Defendants Toyoda Gosei Co., Ltd., Toyoda Gosei North America Corp., and TG Missouri Corp.

By: /s/ David M. Zinn (w/ consent)

David M. Zinn
John E. Schmidtlein
Samuel Bryant Davidoff
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005

Telephone: 202-434-5000

Fax: 202-434-5029 dzinn@wc.com jschmidtlein@wc.com sdavidoff@wc.com

Robert J. Wierenga (P59785) Suzanne L. Wahl (P71364) SCHIFF HARDIN LLP 340 S. Main Street, Suite 210 Ann Arbor, MI 48104 Telephone: 734-222-1500

Fax: 734-222-1501

rwierenga@schiffhardin.com swahl@schiffhardin.com

Attorneys for Defendants Takata Corporation and TK Holdings Inc.

By: /s/ Brian Byrne (w/ consent)

Brian Byrne

Ryan M. Davis

CLEARY GOTTLIEB STEEN & HAMILTON

LLP

2000 Pennsylvania Avenue NW

Washington, DC 20006 Telephone: (202) 974-1850 Facsimile: (202) 974-1999

bbyrne@cgsh.com rmdavis@cgsh.com

By: /s/ Howard B. Iwrey (w/ consent)

Howard B. Iwrey (P39635)

Brian M. Moore (P58584)

DYKEMA GOSSETT PLLC

39577 Woodward Ave., Suite 300

Bloomfield Hills, MI 48304

Tel: (248) 203-0700 Fax: (248) 203-0763 hiwrey@dykema.com

bmoore@dykema.com

Counsel for Valeo S.A., Valeo Japan Co., Ltd., Valeo Inc., Valeo Electrical Systems, Inc., and Valeo Climate Control Corp.

By: /s/ Barry A. Pupkin (w/ consent)

Barry A. Pupkin Iain R. McPhie Jeremy W. Dutra SQUIRE PATTON BOGGS (US) LLP 2550 M Street, NW

Washington, DC 20037

Tel: (202) 457-6000 Fax: (202) 457-6315 Barry.Pupkin@squirepb.com Iain.McPhie@squirepb.com Jeremy.Dutra@squirepb.com

Counsel for Aisan Industry Co., Ltd., Aisan Corporation of America and Franklin Precision Industry, Inc.

By: /s/ Franklin R. Liss (w/ consent)

Franklin R. Liss
Barbara H. Wootton
Tiana L. Russell
Danielle M. Garten
ARNOLD & PORTER LLP
555 Twelfth Street NW
Washington, DC 20004
Tel: (202) 942-5969
Fax: (202) 942-5999
frank.liss@aporter.com

barbara.wootton@aporter.com tiana.russell@aporter.com danielle.garten@aporter.com

Howard B. Iwrey (P39635) Brian M. Moore (P58584) DYKEMA GOSSETT PLLC 39577 Woodward Ave., Suite 300 Bloomfield Hills, MI 48304 Tel: (248) 203-0700

Fax: (248) 203-0700 Fax: (248) 203-0763 hiwrey@dykema.com bmoore@dykema.com

Counsel for Defendants Koito Manufacturing Co., Ltd. and North American Lighting, Inc.

By: /s/ Marguerite M. Sullivan (w/ consent)

Marguerite M. Sullivan Lawrence E. Buterman LATHAM & WATKINS LLP

555 Eleventh Street NW, Suite 1000

Washington, DC 20004 Telephone: (202) 637-2200

Fax: (202) 637-2201

Marguerite.Sullivan@lw.com Lawrence.Buterman@lw.com Daniel M. Wall LATHAM & WATKINS LLP 505 Montgomery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 395-0600 Fax: (415) 395-8095 dan.wall@lw.com

William H. Horton (P31567) GIARMARCO, MULLINS & HORTON, P.C. 101 West Big Beaver Road, Tenth Floor Troy, MI 48084-5280 Telephone: 248-457-7060 bhorton@gmhlaw.com

Attorneys for Defendants Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc.; K&S Wiring Systems, Inc.; and Sumitomo Wiring Systems (U.S.A.) Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2015, I caused the foregoing Notice of Certain Defendants' Objections to End Payor Plaintiff and Auto Dealer Plaintiff Deposition Protocol Order to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: July 21, 2015

By: